



DEPARTMENT OF THE AIR FORCE

WASHINGTON DC

OFFICE OF THE ASSISTANT SECRETARY

Ms. Kathleen H. Johnson
Director, Enforcement Division
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105
Attn: Matt Salazar (ENF-2-1)

Dear Ms. Johnson,

In response to the June 30, 2015 Environmental Protection Agency (EPA) Region 9 request for information (RFI), this letter notifies EPA of the Air Force's submission of the data necessary to determine the Air Force's compliance status with respect to the California Air Resources Board's ("CARB's") *"Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use Heavy-Duty Diesel-Fueled Vehicles"* (the *"Truck and Bus Regulation"*). Per the instructions accompanying EPA's request, all responsive information is included in the enclosed CD and/or in the narrative responses below.

Response #1: The "Older Fleet" tab within EPA's Microsoft Excel file "TRUCKINFO.xlsx" contains all available information for each diesel-fueled vehicle in the Air Force's fleet with a Gross Vehicle Weight Rating (GVWR) greater than 26,000 pounds and an engine Model Year (MY) prior to 2007 that was driven in California at any time from May 4, 2012 to June 30, 2015.

Response #2: Among the twenty-eight (28) vehicles listed in the "Older Fleet" tab in the Microsoft Excel spreadsheet entitled "TRUCKINFO.xlsx" in the enclosed CD, thirteen (13) vehicles have never been equipped with a diesel particulate filter (DPF); three (3) vehicles are currently equipped with DPF; and the twelve (12) vehicles listed in Vandenberg Air Force Base's (AFB's) older fleet are among its seventeen fleet vehicles that have twice been equipped with DPFs under the early-action credit provisions of the California Truck and Bus Regulation but both retrofits were recalled; and the most recent retrofit was ordered to be removed by the California Air Resources Board (CARB). Documentation regarding the recalls is contained in the searchable, Bates-stamped .pdf files numbered AF000055 through AF000063 in the enclosed CD. Note, that six (6) of the 12 Vandenberg vehicles appear to our vehicle management office to be contractor owned and operated vehicles for which we have no mileage information at this time. Nonetheless, we included them out of an overabundance of caution, and we will either follow up with the requisite mileage information if they turn out to actually be Air Force owned/operated or remove them if not. Among the 13 vehicles that have never been retrofitted with DPFs, two (2) are model year 1995 vehicles that do not have any applicable compliance requirement under Section 2025(g) of the California Truck and Bus Regulation until 1 January 2016 and all of the remaining vehicles, except for two (2) vehicles in Beale AFB's fleet, are low-use vehicles as defined in Section 2025(d)(40) that qualify for exemption under Section 2025(p)(4). Note that the engine model year 2005 low-use vehicle in Travis AFB's fleet that logged 7,014 miles in CY 2012, was not required by Section 2025(g) to have a DPF installed

until January 1, 2014. Please also note that we have not included military tactical support vehicles, as described in 13 California Code of Regulations (CCR) Section 1905, as those vehicles are exempt from the requirements of Truck and Bus Regulation per Section 2025(c)(5). Federal and California National Security Exemption documentation is contained in the searchable, Bates-stamped .pdf files numbered AF000001 to AF000054 in the enclosed CD."

Response #3: For those vehicles identified as equipped with a DPF in response #2, requested information is included in the "Older Fleet" tab within EPA's Microsoft Excel file "TRUCKINFO.xlsx".

Response #4: The only vehicles identified as equipped with a DPF in response #2 were originally equipped with DPF by the manufacturer and therefore no installation and purchase order documents are available to include in the enclosed CD.

Response #5: For those vehicles identified as equipped with a DPF in response #2, indication of whether the vehicle has operated continuously since the installation is included in the "Older Fleet" tab within EPA's Microsoft Excel file "TRUCKINFO.xlsx".

Response #6: This question is not applicable, because all DPF-equipped vehicles listed in Response #2 have continuously operated with DPF as designed since installation.

Response #7: Heavy-duty diesel vehicles in the Air Force's fleet driven in California at any time from 4 May 2012 to 30 June 2015, with a GVR greater than 26,000 pounds with 2007, 2008, or 2009 model year engines that are equipped with PM BACT have not been included in the "2007-2009 Fleet" tab in the Microsoft Excel spreadsheet entitled "TRUCKINFO.xlsx" in the enclosed CD. We have included two (2) vehicles from the Vandenberg AFB fleet that do not currently have DPF installed, but Vandenberg AFB's entire fleet subject to the Truck and Bus Regulation already meets the compliance requirements due to Vandenberg AFB's early-action credit program retrofitting of 17 of its affected fleet with DPFs. However, those DPFs have twice been recalled by CARB and most recently CARB ordered that they be removed from the vehicles. Nonetheless, Vandenberg AFB's early action efforts have earned full compliance with the Truck and Bus Regulation until January 1, 2020. Documentation regarding the recalls is contained in the searchable, Bates-stamped .pdf files numbered AF000055 through AF000063 in the enclosed CD. Please note that we have not included in the "2007-2009 Fleet" tab military tactical support vehicles, as described in 13 California Code of Regulations (CCR) Section 1905, as those vehicles are exempt from the requirements of Truck and Bus Regulation per Section 2025(c)(5). Federal and California National Security Exemption documentation is contained in the searchable, Bates-stamped .pdf files numbered AF000001 to AF000054 in the enclosed CD. Among the fourteen (14) vehicles listed in the "2007-2009 Fleet" tab all of them, except for one (1) vehicle in Travis AFB's fleet, that are not equipped with PM BACT are low-use vehicles as defined in Section 2025(d)(40) of the Truck and Bus Regulation that qualify for exemption under Section 2025(p)(4).

Response #8: For those vehicles identified in Response #1, which are still in the active fleet (i.e., not retired), total mileage traveled in California for the specified periods is included in the "Older Fleet" tab within EPA's Microsoft Excel file "TRUCKINFO.xlsx".

Response #9: For vehicles identified in response to requests 1 and 7, their status as a drayage truck is noted in the "Older Fleet" and "2007-2009 Fleet" tabs within EPA's Microsoft Excel file "TRUCKINFO.xlsx".

Response #10: The Air Force does not participate in or use the International Registration Plan (IRP) for tracking vehicles.

Response #11: The terminal name, address, telephone number and contact person for each terminal identified in response to requests 1 and 7 in the "Older Fleet" and "2007-2009 Fleet" tabs are provided in the "Terminals" tab within EPA's Microsoft Excel file "TRUCKINFO.xlsx".

Response #12: The Air Force does not typically hire or dispatch trucks for the purpose of trucking. If and when these services are contracted out they are done by other federal government agencies, such as the Defense Logistics Agency or the United States Transportation Command (TRANSCOM).

Response #13: Please see Response #12

Response #14: With the exception of GSA lease vehicles (which the Air Force manages and treats the same as Air Force owned vehicles due to the long term, multi-year leases) the Air Force does not lease on-demand vehicles to support operations. Accordingly, all GSA-leased vehicles utilized for Air Force support have been captured in the "Older Fleet" or "2007-2009 Fleet" tabs within EPA's Microsoft Excel file "TRUCKINFO.xlsx".

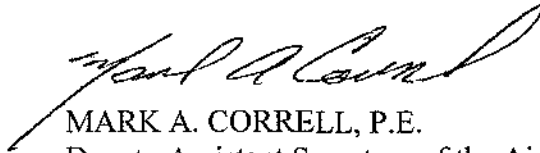
Response #15: Please see Response #14.

Response #16: As shown by the "Older Fleet" and the "2007-2009 Fleet" tabs within EPA's Microsoft Excel file "TRUCKINFO.xlsx" in the enclosed CD, the vast majority of Air Force heavy-duty diesel vehicles that are subject to the requirements of Section 2025(g) of the Truck and Bus Regulation are low-use vehicles as defined in Section 2025(d)(40) that qualify for exemption under Section 2025(p)(4). Vandenberg Air Force Base took aggressive efforts to obtain early-action credits under the Truck and Bus Regulation by retrofitting 17 of its light-duty and heavy-duty diesel vehicles subject to the Truck and Bus Regulation with Diesel Particulate Filters (DPFs) during November 2010. Those original DPFs were recalled and replaced and recently the replacement DPFs have also been recalled and ordered to be removed by CARB. Nonetheless, Vandenberg AFB continues to be entitled to receive early-action credit under the Truck and Bus regulation; all twenty-four (24) of its light-duty and heavy-duty diesels subject to the Truck and Bus Regulation are fully compliant until January 1, 2020; and all 24 vehicles are reported in CARB's "Truck Regulation Upload, Compliance, and Reporting System (TRUCRS)." Note, however as mentioned in the response to #2 above, some of the vehicles appear to be contractor owned and operated vehicles for which we have no mileage at this time but included out of an overabundance of caution; and we will either follow up with mileage information if they turn out to actually be Air Force owned/operated or remove them if not. Documentation regarding the recalls is contained in the searchable, Bates-stamped .pdf files numbered AF000055 through AF000063 in the enclosed CD. The 2008 model year engine/vehicle at Travis AFB, license plate number "09N00006," has been directed to be taken out of service on or before 6 November 2015 and scheduled for installation of DPF or replacement with a compliant vehicle/engine. The three (3) "Older Fleet" vehicles that no longer qualify for the low-use exemption – 2 vehicles in Beale AFB's fleet and 1 vehicle at Travis AFB's fleet – have all been directed to be taken out of service on or before 6 November 2015 and scheduled for installation of DPF or replacement with a compliant vehicle/engine. For purposes of electing and maintaining the low-use exemption, all affected installations were

reminded on or about 4 November 2014 of the requirements of Section 2025(e)(7) and Section 2025(r)(12) of the Truck and Bus Regulation; and all affected installations that were not already doing so have been directed to begin tracking and reporting their low-use diesel vehicles subject to the Truck and Bus Regulation in CARB's TRUCRS compliance and reporting system. ⁴

The Air Force is committed to and supports continued efforts to achieve the national ambient air quality standards as we fulfill our national security mission. If you or your staff have any questions concerning the submitted data please contact Mr. Daniel Kowalczyk of my staff at (703) 697-1198 or email at daniel.f.kowalczyk.ctr@mail.mil.

Sincerely,



MARK A. CORRELL, P.E.
Deputy Assistant Secretary of the Air Force
(Environment, Safety, and Infrastructure)

Attachments:

1. Statement of Certification
2. AF TRUCKINFO.xlsx file

cc:

SAF/IE
SAF/GCN
AF/A4C
AF/A4L
AFLOA/JACE

The U.S. Department of the Air Force ("Air Force") is submitting the enclosed documents in response to the U.S. Environmental Protection Agency's ("EPA") request for information, issued pursuant to Section 114(a) of the Clean Air Act, to determine whether the facility is in compliance with the Clean Air Act, including with the federally-approved California Truck and Bus Regulation.

I certify that I am fully authorized by the Air Force to provide the above information on its behalf to EPA.

I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true, correct, accurate and complete. I am aware that there are significant penalties for submitting false statements and information, or omitting required statements and information, including the possibility of fines and imprisonment for knowing violations.

Date: 13 NOV 15

Name (Printed): MARK A. CORRELL

Signature: [Handwritten Signature]

Title: Deputy Asst Secretary, Environmental Safety, & Infrastructure

